

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

MALIBU MEDIA, LLC,)
)
Plaintiff,) Civil Case No. 2:13-cv-01105-WEC
)
v.)
MICHAEL PERLEWITZ,)
)
Defendant.)

)

**PLAINTIFF'S SECOND MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO SERVE EXPERT WITNESS REPORTS**

Plaintiff, Malibu Media, LLC, moves for entry of an order extending the time within which it has to serve its Expert Witness Reports on Defendant, and states:

1. Pursuant to this Court's Amended Scheduling Order entered on April 23, 2014 [CM/ECF 18], Plaintiff is required to disclose its experts and serve its experts' reports on Defendant by no later today, June 30, 2014.

2. Plaintiff served its Expert Witness List and Partial Report on Defendant on April 1, 2014. However, Plaintiff's expert has been unable to prepare his report because the Defendant has yet to produce the hard drive(s). Plaintiff requested forensically sound copies of all hard drives in Defendant's home in its First Request for Production which was also served today, April 1, 2014. Defendant's responses were due May 1, 2014.

3. The parties are currently in settlement negotiations, although a settlement has not been reached.

4. Procedurally, Plaintiff respectfully requests an extension of sixty (60) days to serve its expert report, should the parties fail to reach an amicable resolution.

5. This request is made in good faith and not made for the purpose of undue delay.

6. Plaintiff has attempted to confer with Defendant regarding the extension but has not received a response as of the time of this filing.

WHEREFORE, Plaintiff respectfully requests that the time within which it must serve its expert reports on Defendant be extended by sixty (60) days, or until August 29, 2014, and that any affected deadlines be adjusted accordingly. A proposed order is attached for the Court's convenience.

Dated: June 30, 2014

Respectfully submitted,

SCHULZ LAW, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2014, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Mary K. Schulz